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9 The Davey Tree Expert Company

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12 UNITED STATES BANKRUPTCY COURT  
13 NORTHERN DISTRICT OF CALIFORNIA

14 SAN FRANCISCO DIVISION

15 In re ) Case No. 19-30088 DM (Lead Case)  
16 PG&E CORPORATION ) Chapter 11  
17 - and - ) (Jointly Administered Case No. 19-30089 DM)  
18 PACIFIC GAS AND ELECTRIC )  
19 COMPANY, )  
20 Debtors. )

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21 **NOTICE OF APPEARANCE AND**  
**REQUEST FOR SERVICE OF PAPERS**

- 22  Affects PG&E Corporation )  
23  Affects Pacific Gas and Electric )  
24  Affects both Debtors. )

25 \* All papers shall be filed in the )  
26 Lead Case No. 19-30088 DM. )

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1           **PLEASE TAKE NOTICE THAT** The Davey Tree Expert Company ("Davey"), as a  
2 party-in-interest in the above-captioned cases, hereby appears by its counsel, Irell & Manella LLP,  
3 and such counsel hereby enters its appearance pursuant to 11 U.S.C. § 1109(b) and Federal Rule  
4 of Bankruptcy Procedure 9010(b), and such counsel hereby requests, pursuant to rules 2002, 9007,  
5 and 9010 of the Federal Rules of Bankruptcy Procedure, N.D. Cal. L.R. 2002-1, and 11 U.S.C.  
6 §§ 342 and 1109(b), that copies of all notices and pleadings given or filed in this case be given and  
7 served upon them at the following addresses, emails, and telephone numbers:

8  
9           **IRELL & MANELLA LLP**  
10          Jeffrey M. Reisner  
11          Kerri A. Lyman  
12          840 Newport Center Drive  
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15          Telephone: (949) 760-5242  
16          Facsimile: (949) 760-5200  
17          Email: jreisner@irell.com  
18                                    klyman@irell.com

19           and

20           **THE DAVEY TREE EXPERT COMPANY**  
21          Attn: Erika J. Schoenberger, General Counsel  
22          1500 N. Mantua Street  
23          Kent, Ohio 44240  
24          Telephone: 330-673-9511 Ext. 8549  
25          Email: Erika.Schoenberger@davey.com

26           **PLEASE TAKE FURTHER NOTICE THAT**, pursuant to 11 U.S.C. § 1109(b), the  
27 foregoing demand includes not only the notices and papers referred to in the Rules specified  
28 above, but also includes, without limitation, any notice, application, complaint, demand, motion,  
petition, pleading or request, whether formal or informal, written or oral, and whether transmitted  
or conveyed by mail, hand delivery, e-mail, telephone, telecopy or otherwise filed or made with  
regard to the above-referenced case and proceedings herein.

29           **PLEASE TAKE FURTHER NOTICE THAT** neither this Notice of Appearance, nor  
any subsequent appearance, pleading, claim, or suit are not intended as, nor shall be deemed, a

1 consent to or waiver of Davey's: (i) right to have final orders in non-core matters entered only  
2 after de novo review by a district judge; (ii) right to trial by jury in any proceeding so triable  
3 herein or in any case, controversy, or proceeding related hereto; (iii) right to have the reference  
4 withdrawn by the United States District Court in any matter subject to mandatory or discretionary  
5 withdrawal; or (iv) other rights, claim, actions, defenses, setoffs, or recoupments to which Davey  
6 is or may be entitled under any agreements, in law, or in equity, all of which rights, claims,  
7 actions, defenses, setoffs, and recoupments expressly are reserved.

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9 Dated: March 5, 2019

IRELL & MANELLA LLP

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By:



Jeffrey M. Reisner  
Attorneys for Creditor  
The Davey Tree Expert Company

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